

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :
 :
 v. : Crim. No. 11-366 (JLL)
 :
 :
 JOHN ALFY SALAMA MARKUS, :
 a/k/a "John Salama," : **PROTECTIVE ORDER ON CONSENT**
 a/k/a "John Alfy Salama" :

This application having been opened to the Court by the United States Attorney (Sandra L. Moser, Assistant U.S. Attorney, appearing) under Rule 16(d)(1) of the Federal Rules of Criminal Procedure for a protective order limiting the disclosure of the contents of electronic files recovered from servers maintained by the Department of Defense, Department of the Army, United States Army Corps of Engineers ("USACE") in Tikrit, Iraq (hereinafter, the "USACE electronic files"), and which have been or will be made available to counsel for defendant John Alfy Salama Markus (Michael Rogers, Esq., appearing), and the Court, having the consent of the parties, and for good cause shown,


IT IS on this 29th day of May, 2012,

ORDERED that:

1. The USACE electronic files shall not be disclosed to anyone other than the defendant, the defendant's counsel, and any agent working at the direction of defense counsel in this matter;
2. The USACE electronic files and information contained in the USACE electronic files, only will be used in the

preparation of the defense in this case and notwithstanding the provisions of Paragraph 1, the defense shall be permitted to review, with prospective witnesses and their counsel, all materials referenced in Paragraph 1 to the extent necessary to prepare the defense;

3. Notwithstanding any other provision, the defendant shall be permitted to disclose any materials provided in Paragraph 1 in connection with the filing of the defendant's motions with the Court, or for use at trial, subject to Fed. R. Crim. P. 41.1; and
4. If there is a need prior to trial or during trial to disclose the USACE electronic files or information contained in the USACE electronic files, beyond that permitted by this Order, then the defendant will make an application to the Court upon notice to the government, requesting authorization.



HONORABLE JOSE L. LINARES
UNITED STATES DISTRICT JUDGE